



**The Secretary of Energy**  
Washington, DC 20585

May 11, 2001

MEMORANDUM FOR SECRETARIAL OFFICERS  
AND FIELD OFFICE MANAGERS

FROM:

SPENCER ABRAHAM

SUBJECT:

**Fire Management Program Direction**

Following the Cerro Grande fire in New Mexico, the Deputy Secretary of Energy issued a memorandum on June 5, 2000, "Moratorium on Prescribed Fires," suspending all Department of Energy (DOE) prescribed fires. The purpose of this memorandum is to inform you that the prescribed fire moratorium is still in force and will remain so until such time as the Department's wildland and fire management policy and implementing guidance are issued. DOE recognizes that certain sites have to address wildland fires, prescribed fires and other fires during the upcoming fire season. In the interim and effective immediately, authority for approving a prescribed fire waiver request to the moratorium shall reside with Field Office Managers or their direct report in charge of a specific site.

To support the development of a DOE-wide wildland and fire management policy and implementing guidance, the office of Environment, Safety and Health (EH), in coordination with the DOE Fire Safety Committee, has been reviewing relevant documents, including the 2001 Federal Wildland Fire Management Policy, Wildland and Prescribed Fire Management Policy Implementation and Procedures Reference Guide, Initial Joint Review of Wildland Fire Safety at DOE sites, Comprehensive Fire Safety Review, and lessons learned from the Cerro Grande fire. Field sites have also provided responses to the Wildland and Prescribed Fire Questionnaire developed by EH, the results of which have supported the development of baseline information pertaining to existing fire policies, procedures and practices across the DOE complex. These data were helpful in the development of this Program Direction memorandum and will assist us as we develop the Department's wildland and fire management policy and implementing guidance.

"Prescribed fires/controlled burns" are planned management actions for Fuels reduction and for ecosystem management. They are considered part of a site's land and resource management planning and are generally included in a site's wildland fire management planning documents. This contrasts with "operational fires," which are defined as planned management actions to safely and cost effectively remove debris from operational or construction activities. They are conducted in cleared or designated areas. Operational fires are more limited in complexity and duration than prescribed fires. They include, for example, fire in incinerators or open pits; or fires to burn debris from land clearing/grubbing for structures, mining activities, timber harvesting, power line or pipeline construction, and road construction.



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DOE Field Office Managers, or their direct report in charge of a specific site, may grant waivers for prescribed fires based on a documented review of relevant criteria set forth in the attachment to this memorandum. These criteria shall be considered and addressed, as appropriate, in each site's DOE approved wildland fire management planning documents. Site fire management planning documents shall address the full range of fires, including planning for and response to wildfires, prescribed fires, and operational fires. Site fire management planning documents shall also include procedures for the notification of the DOE Headquarters Emergency Operations Center and Lead Program Secretarial Officer as appropriate. The fire management planning documents discussed above refer to existing plans currently in place at sites that routinely conduct prescribed and operational fire. The appropriate managers (e.g., Nuclear Safety, Radiological Control Manager and Fire Protection Manager) should concur, as appropriate, with fire management planning documents prior to Field Office Manager approval of waiver requests. Operational fires conducted at DOE sites are not considered prescribed fires and therefore are not subject to the moratorium. However, operational fires shall be approved by DOE Field Office Managers, or their designee, based on plans that document the consideration of relevant criteria, using a graded approach.

Attachment: FIELD MANAGER CHECKLIST FOR APPROVING INDIVIDUAL  
PRESCRIBED AND OPERATIONAL FIRES

## **FIELD MANAGER CHECKLIST FOR APPROVING INDIVIDUAL PRESCRIBED AND OPERATIONAL FIRES**

The decision to proceed with a planned fire, both prescribed and operational fires, is based on many site-specific factors and complexities that influence the determination. Fire management planning documents, specific waivers to the moratorium on prescribed fires and requests for approval of operational fires submitted to DOE Field Office Managers, or their direct report in charge of a specific site, for approval shall consider and address, in a documented review, the relevant criteria set forth below. A burn plan shall be developed and locally approved by DOE Field Office Managers, or their designee, to address the objectives and potential impacts of a fire. A planned fire always has a risk. Burn plans shall assess the factors that can adversely impact a planned fire and carefully and rationally address needed controls to prevent or mitigate the hazards. Burn plans shall be developed using the integrated safety management system approach and be fully consistent with existing land and resource management plans. Coordination and planning with other federal, State and local agencies and organizations is essential for fire management planning and response. Burn plans shall also include procedures for the notification of the DOE Headquarters Emergency Operations Center and Lead Program Secretarial Officer as appropriate. The U. S. Forest Service Manual on Fire Management (Title 5100) is a good reference for models and tools for making “go/no-go” decisions for planned fires.

In approving individual prescribed burns and operational fires, Field Office Managers, or their direct report in charge of a specific site, shall consider as appropriate the following:

### **NEED**

1. Have alternatives to the proposed fire been considered?
2. What is the justification for this proposed fire?
3. What are the objectives of this fire?
4. Are there any controversial site property, personnel, firefighter or public issues that may affect decisions or plans regarding this fire?

### **SITE BACKGROUND**

5. Location of proposed fire?
6. Description of area?
7. Time frame and schedule of proposed fire?

## **ADMINISTRATIVE AND MANAGEMENT**

8. Who will conduct the fire?
9. Are clear lines of authority established?
10. Are individual responsibilities clearly identified for all aspects of the fire?
11. Is proposed fire consistent with the site's fire management plan?
12. Have all necessary approvals and permits been obtained?
13. Is hazard information readily available to emergency responders upon dispatch to the area?
14. What personnel and organizations (on and off site) will be notified prior to the fire?
15. Are there adequate fire response personnel available onsite?
16. Are emergency response contingency plans in place in the event the fire escapes its controls?
17. Have arrangements been made with offsite emergency response organizations in the event their assistance is needed?
18. Has the plan for the proposed fire been reviewed by a qualified fire safety, forest management and emergency services (fire department) subject matter expert?

## **MONITORING, ANALYSIS AND TECHNICAL ISSUES**

19. Have all relevant hazards been assessed and addressed, including:
  - weather conditions (forecasted wind, heat, precipitation, etc.), including establishment of bounding weather conditions
  - fire conditions (combustibility of materials and undergrowth, etc.)
  - ignition options (torch, fuel oil, etc.)
  - terrain slope and conditions
  - accessibility of personnel or equipment to fire area
  - nearby hazardous or combustible materials
  - radiological contamination
  - nearby facilities, including defensible space around facilities in accordance with NFPA Code 299
  - proper personnel protective equipment
20. Have all controls been addressed, including:
  - fire watch
  - monitoring equipment
  - firefighting/suppression equipment and supplies
  - qualified fire/burn technicians and other trained personnel

21. Has a fuels assessment been conducted to determine vulnerability of a wildfire?
22. Does the plan for the proposed fire address impacts to the environment from potential firefighting efforts?
23. Have the potential impacts of the proposed fire on the following been considered and addressed:
  - habitat (wildlife, fish, plants)
  - watersheds
  - endangered species
  - air quality (including prevention -of-significant-deterioration air quality impacts that might be required by State regulations
  - soil erosion
  - other ecosystems
  - cultural resource areas
  - hazardous or radioactive waste storage or burial areas that may be vulnerable to this fire event
24. Does the proposed fire comply with applicable Federal clean air or State General Conformity regulations that apply to federal agencies, if the fire will occur in a nonattainment or maintenance area?
25. Are safeguards identified in the tire management plan to protect storage/burial areas and the environment from fire or an environmental release that could result from this fire event?
26. Is there a contamination profile of the site available that identifies the possible contaminants and their actual or potential concentrations and location?
27. Does the site's environmental surveillance program allow monitoring of the environment during and after a fire event for releases of radioactive and hazardous substances?
28. Has the need for ecosystem restoration after the fire event been assessed and planned?
29. Has safety of site personnel and property, firefighters or the public been considered and addressed?